

Alla Kachan, Esq.
Law Offices of Alla Kachan, P.C.
2799 Coney Island Avenue, Suite 202
Brooklyn, NY 11235
Tel: (718) 513-3145

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

Rosemarie Lopa,

Case No: 1-23-42457
Chapter 11

Debtor.

AFFIDAVIT RELATING TO PAYMENT OF
THIRD-PARTY RETAINER

STATE OF NEW YORK)

COUNTY OF KINGS)

ss:

I, Paul Lopa on behalf of Paul Lopa Design Inc., being duly sworn, depose and say:

1. I submit this Affidavit on behalf of Paul Lopa Design Inc in support of the application filed by the Debtor relating to the retention of Law Offices of Alla Kachan P.C. as an Attorney for the Debtor in this bankruptcy case.

2. As disclosed in the Affidavit of Disinterestedness of Attorney filed in support of the Law Offices of Alla Kachan P.C. retention, Paul Lopa Design Inc., with Paul Lopa as President, paid Law Offices of Alla Kachan P.C. a \$5,000.00 retainer on July 10, 2023, in connection with this matter out of its funds and from its bank account. Paul Lopa Design Inc. shall have no claim against the Debtor's estate with respect to repayment of such retainer. An additional application for post-petition services, will be made by the Kachan Law Office at a future time, before the additional retainer is drawn upon.

3. This shall confirm I Paul Lopa, President of Paul Lopa Design Inc, am fully aware that Law Offices of Alla Kachan P.C. owes a duty of undivided loyalty to the Debtor only. I, Paul

Lopa, President of Paul Lopa Design Inc., have been advised by Law Offices of Alla Kachan P.C. that if a conflict of interest should arise that Law Offices of Alla Kachan P.C. will notify both the Court and me, and that in such circumstances I should consult with an independent attorney in connection with this matter.

4. The Debtor does not owe any money to the Law Offices of Alla Kachan P.C. and Paul Lopa Design Inc. does not owe any money to the Debtor. Paul Lopa Design Inc. does not owe any money to the Law Offices of Alla Kachan P.C. and Law Offices of Alla Kachan P.C. does not owe any money to Paul Lopa Design Inc.

5. Further, Paul Lopa Design Inc. does not have any intention of asserting a claim against the estate of the Debtor for funds advanced for attorney fees in this case or any future fees to be paid to Law Offices of Alla Kachan P.C.

6. Neither I nor Paul Lopa Design Inc. provide any financing to the Debtor or intend to provide any financing to the Debtor. Furthermore, neither I nor Paul Lopa Design Inc. intend to purchase or bid on any assets owned by the Debtor.

6. Based upon the foregoing, it is my belief that Paul Lopa Design Inc. does not have any adverse interest against the estate of the Debtor herein, or with any creditor or any other party in interest.

I, Paul Lopa, President of Paul Lopa Design Inc., declare under penalty of perjury that the foregoing is true and correct.

Dated:
July 16, 2024



Paul Lopa,
President of Paul Lopa Design Inc.

Duly sworn to before me this

16th day of July, 2024.

7/16/24, 6:12 PM

Image0.jpeg

Maria F. Caiazzo
(Notary Public)

